

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

CIVIL DOCKET: 1:04-CV-10080-GAO

RALPH VOLLMAN,
Plaintiff,

v.

ROGER LYNN GRUBB and
ALLIED SYSTEMS, LTD.
Defendants.

}
}
}
}
}
}
}
}

OCTOBER 15, 2004

DEFENDANTS' OBJECTION TO PLAINTIFF'S MOTION TO COMPEL DISCOVERY
UNDER RULE 37(A)(2) AGAINST DEFENDANT ALLIED SYSTEMS, LTD.

The undersigned defendants, Allied Systems, Ltd. and Rodger Lynn Grubb, respectfully object to the plaintiff's motion to compel discovery against Defendant Allied Systems, Ltd. dated October 12, 2004. In said motion, the plaintiff moved, pursuant to Rule 37 of the Federal Rules of Civil Procedure, for an order from this court seeking compliance with the plaintiff's Interrogatories and Requests for Production directed to the defendant, Allied Systems, Ltd.

The defendant, Allied Systems, Ltd., has complied with the plaintiff's Interrogatories and Requests for Production of Documents served pursuant to Rule 34, by the plaintiff, Ralph Vollmann. Copies of the responses are attached hereto as Exhibit (A) and Exhibit (B).

WHEREFORE, for the foregoing reason, the undersigned Defendants respectfully request that the court deny the plaintiff's Motion to Compel.

Date: October 15, 2004
18

Respectfully submitted,

By:

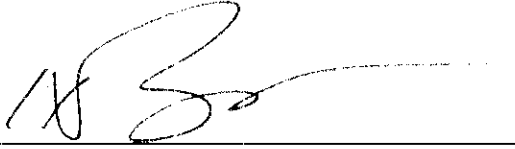


N. Kane Bennett of
HALLORAN & SAGE, LLP
One Goodwin Square
225 Asylum Street
Hartford, CT 06103
(860) 522-6103
BBO# 636731
Attorney for the Defendants

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the above document was served upon the attorney of record of each party on October 15, 2004.

Paul Nathan, Esq.
Nathan & Kavat
159 Derby Street
Salem, MA 01970
(978) 745-4455
BBO#367420



N. Kane Bennett
HALLORAN & SAGE, LLP
BBO# 636731
Attorney for the Defendants